

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

v.

CASE NO.: 23-CV-24299

AMOR DE JESUS CORP., et al.,

Defendants.

DEFENDANTS' JOINT
INITIAL RULE 26(a) DISCLOSURES

COME NOW, Defendants, by and through undersigned counsel, and hereby file this their Initial Rule 26(a) Disclosures of the information reasonably available to them as follows:

I. Individuals with Discoverable Information: The following list of individuals known to the Defendants at this time are likely to have discoverable information that the Defendants may use to support its claims or defenses, unless solely for impeachment, and the subjects of that information:

A. Maria Elena Chavez Letona, Plaintiff
c/o FairLaw Firm

Maria Elena Chavez Letona has knowledge regarding her employment with Defendants, the type of work she performed for Defendants, her responsibilities, hours worked, pay received from Defendants, cash received from Defendants, and all other issues raised by the pleadings.

B. Designated Representative for Amor de Jesus, Corp., Defendant
c/o Emmanuel Perez & Associates, P.A.

The 30(b)(6) representative of Amor de Jesus, Corp., will have knowledge of Plaintiff's employment with Defendants, its gross annual revenues, the general business of Defendants, payroll records, accounting records, pay and payroll practices, the timekeeping by Defendants, the way that Defendants monitored the days and hours worked by Plaintiff, the employment and time records

made and kept by Defendants, the other records made and kept by Defendants relating to the time when Plaintiff worked and/or was subject to work for Defendants, the policies and procedures of Defendants as they related to payment, overtime wage payments, if any, pay deductions, write-ups, and other information relevant to the issues raised by the pleadings.

C. Sweet Living Facility Inc, Defendant
c/o Emmanuel Perez & Associates, P.A.

The 30(b)(6) representative of Sweet Living Facility Inc., will have knowledge of Plaintiff's employment with Defendants, its gross annual revenues, the general business of Defendants, payroll records, accounting records, pay and payroll practices, the timekeeping by Defendants, the way that Defendants monitored the days and hours worked by Plaintiff, the employment and time records made and kept by Defendants, the other records made and kept by Defendants relating to the time when Plaintiff worked and/or was subject to work for Defendants, the policies and procedures of Defendants as they related to payment, overtime wage payments, if any, pay deductions, write-ups, and other information relevant to the issues raised by the pleadings.

D. Zelmira Quinonez, Defendant
c/o Emmanuel Perez & Associates, P.A.

Zelmira Quinonez has knowledge of Plaintiff's employment with Defendants, the employment and time records made and kept by Defendants, the general business of Defendant, the other records made and kept by Defendant relating to the time when Plaintiff worked and/or was subject to work for Defendants, the policies and procedures of Defendants as they related to payment, overtime wage payments, deductions from pay, and other information relevant to the issues raised by the pleadings.

E. Aminta Quinonez, Defendant
c/o Emmanuel Perez & Associates, P.A.

Aminta Quinonez has knowledge of Plaintiff's employment with Defendants, the employment and time records made and kept by Defendants, the general business of Defendant, the other records

made and kept by Defendant relating to the time when Plaintiff worked and/or was subject to work for Defendants, the policies and procedures of Defendants as they related to payment, overtime wage payments, deductions from pay, and other information relevant to the issues raised by the pleadings.

II. Documentary and Electronic Information: The following is a description by category and location of the documents, data compilations, and tangible things in Defendants' possession, custody, or control that Defendants may use to support their claims or defenses, unless solely for impeachment:

A. Zelle payments to Plaintiff

B. Plaintiff's and Defendants Text Messages

III. Privileged Documents Being Withheld by Defendants: Notes and memoranda prepared by Defendants' counsel reflecting confidential information provided by Defendants to his counsel regarding the matters at issue in this case. Privileges asserted: attorney/client privilege, attorney work product.

I HEREBY CERTIFY that a true and correct copy of the foregoing pleading has been electronically filed and served via EM/ECF to all listed persons receiving notice on this 25th day of January 2024.

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